

Exhibit 3

Declaration of Eden Shemuelian



Shemuelian, Eden <[REDACTED]>

Standing Against Bigotry at the University of California

Shemuelian, Eden <[REDACTED]>
To: "Waterstone, Michael" <[REDACTED]>
Cc: [REDACTED]

Thu, Nov 16, 2023 at 11:02 AM

Hi Dean Waterstone,

Thank you for the update.
No rush—after Thanksgiving would be great. I'll reach out again then.
Take care, and happy Thanksgiving.

Warmly,
Eden

On Thu, Nov 16, 2023 at 9:00AM Waterstone, Michael <[REDACTED]> wrote:

Dear Eden,

Thank you for your note, and for coming. Yes, it is always hard to manage the clock with a lot of individuals involved.

Yes, I did forward your e-mail to the University Dean of Students, and they confirmed receipt.

I'm happy to meet again. I may ask that it be after Thanksgiving, if possible – things are very jammed up until then, and I'm leaving town Tuesday night. But if it is important that we meet sooner I'll find a way.

Thank you,

Michael Waterstone

From: Shemuelian, Eden <[REDACTED]>
Date: Wednesday, November 15, 2023 at 9:19 PM
To: Waterstone, Michael <[REDACTED]>
Subject: Re: Standing Against Bigotry at the University of California

Hi Dean Waterstone,

I hope you're doing okay.
Thank you for meeting with us Jewish law students today. It was nice to have a candid conversation with you and understand your perspective.
While I respect differing views, I (and some of my peers) felt a little robbed of the valuable time we had with you today near the end of the meeting. I know there was nothing you could do about it, but I hope we can connect again soon, as I still have thoughts and suggestions I wanted to share with you, but was unable to.

SHEMUELIAN DECLARATION EXHIBIT 3

I also wanted to follow up on my previous email and confirm that you forwarded my email to the University Dean of Students?

Thank you again, and I look forward to hearing from you.

Warmly,
Eden

On Mon, Nov 13, 2023 at 10:59AM Shemuelian, Eden <[REDACTED]> wrote:

Hi Dean Waterstone,

Thank you for your email.

Yes, please forward my email to the University Dean of Students at your earliest. I would also like to add one more student to my report below, specifically for vandalism/tearing down the kidnapped posters from bulletin boards. His name is [REDACTED] (currently a 2L). I have witnesses to corroborate if needed.

I will also submit an EDI report to the Office of the Assistant Vice Chancellor for Civil Rights.

Looking forward to hearing from you and holding these individuals accountable.

Sincerely,

Eden

On Mon, Nov 13, 2023 at 8:50AM Waterstone, Michael <[REDACTED]> wrote:

Dear Eden,

Thank you for your e-mail. I am sorry you are having to go through this, and I appreciate hearing from you personally.

Over the weekend, I refamiliarized myself with our law school and University processes for reports of this type and the handling of these incidents happens at the University level. Because we take these concerns seriously, we believe we must follow official next steps as required by campus. Our campus partners will investigate further and determine whether there's been a violation of a relevant policy.

There are actually several types of reporting that could be relevant here. Alleged violations of campus policies related to discrimination/EDI are filed [here](#), in the Office of the Assistant Vice Chancellor for Civil Rights. Alternatively (and complementary), you can send a purported violation of the Student Code of Conduct to [REDACTED] (we can forward the e-mail you sent below to that address, but I didn't want to presume you wanted us to). Campus policies dictate that allegations of discrimination or other prohibited behavior in the Student Code of Conduct should be reported to relevant campus offices, as they are responsible for investigating the claims and reaching any determination. Aside from reporting the complaints, we cooperate with those campus colleagues in any way they deem necessary as part of their processes.

Finally, in terms of the Chancellor's reference to the Statements of Principles Against Intolerance, there is a guidance [here](#).

Please let me know if you would like us to forward your e-mail to the University Dean of Students, as per above. Thank you for keeping the lines of communication open.

Best,

Michael Waterstone

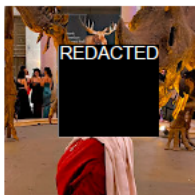
From: Shemuelian, Eden <[REDACTED]>
Date: Friday, November 10, 2023 at 5:43 PM
To: Waterstone, Michael <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>, Student Affairs <[REDACTED]>, Suttonwills, Brenda <[REDACTED]>, McKenna, Mark <[REDACTED]>, Kim, Sung Hui <[REDACTED]>
Subject: Fwd: Standing Against Bigotry at the University of California

Hello Dean Waterstone,

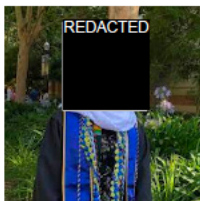
Per Gene Block's email below, I am formalizing my reports in this email (after my many meetings and talks with various Vice Deans on campus) of actions in violation of Regents Policy 4403: Statements of Principles Against Intolerance. As Chancellor Gene Block noted below, "anyone found to be in violation of the law or the UCLA code of conduct will be held accountable," so I expect all implicated students, which I have hyperlinked their LinkedIn profiles below, and faculty/staff to be held accountable for the actions outlined below.

Implicated Students:

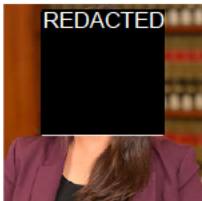
REDACTED



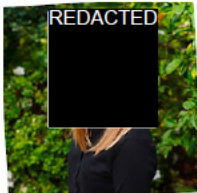
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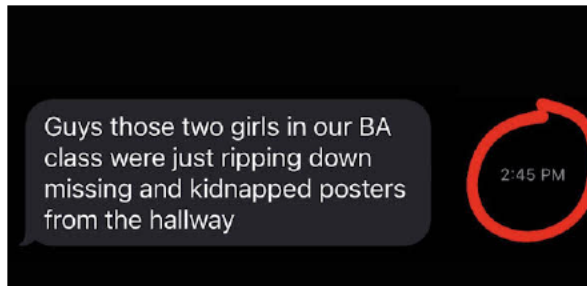
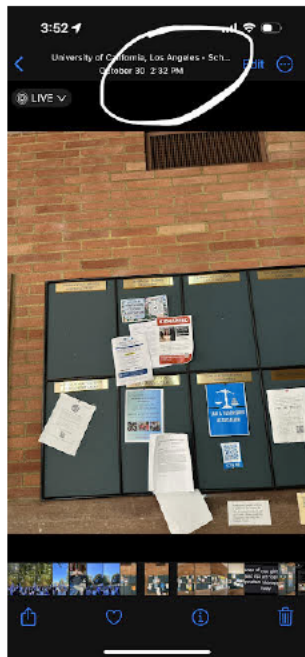
REDACTED



Events:

1. Vandalism and acts of anti-semitic hate and terror (10/30)

REDACTED and REDACTED tore down posters of innocent kidnapped civilians that my peers and I placed on the JLSA bulletin boards within thirteen minutes of us posting them up.



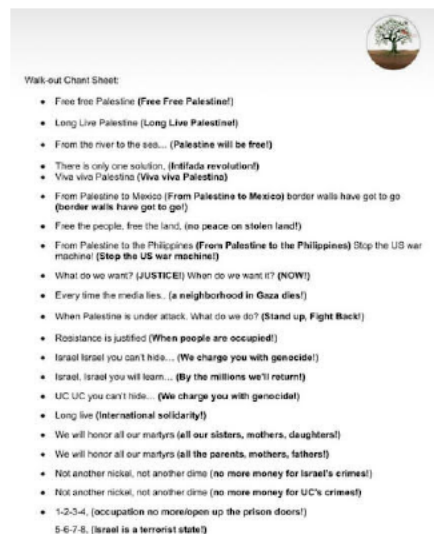
See witness video [here](#).

2. Engaging in extremely hateful behavior and shouting despicable antisemitic language in the Shapiro Courtyard (11/8)

All four students publicly yelled "There is Only One Solution," "Intifada," "From the River to the Sea," "UC UC You Can't Hide, We Charge You With Genocide" (along with many other anti-semitic chants, as noted in the sheet below) in the courtyard, less than ten feet away from me and my peers, for a long period of time. My Jewish peers and I were so absolutely frightened that we could not go to class, where [REDACTED] and [REDACTED] sit only a couple seats behind me. We left class shaking, crying, unable to breathe, and dizzy, and had no choice but to go directly to the Vice Deans, McKenna and Kim.

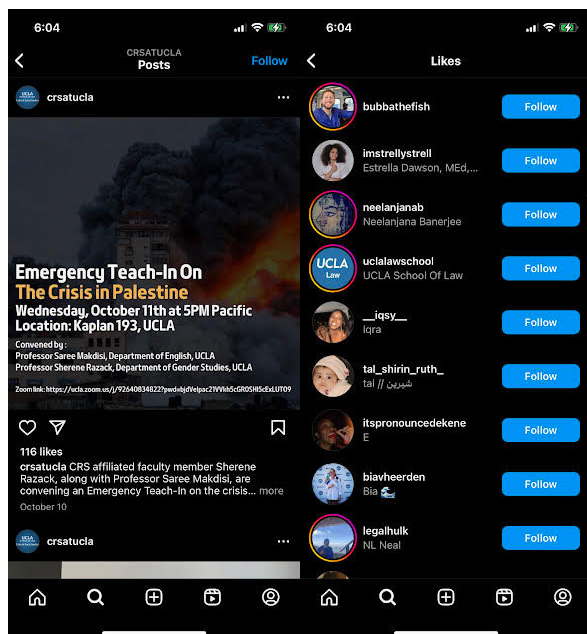
See video of march here, where you can see all four students chanting these slogans.

Note that [REDACTED], [REDACTED], and [REDACTED] are all masked up, but they are identifiable and I have witnesses to confirm if needed. [REDACTED] is not masked, and is pretty easily identifiable as she is front and center.



3. UCLA Law School Instagram

The social media manager of the UCLA Law School instagram account has taken it upon themselves to like posts, such as the one below, which are anti-semitic and erasive of the history of Israel. As you already know, "Palestine" is not an accurate term for the land they may be referring to (as Palestine is not a recognized state). These posts further the improper political indoctrination happening on campus, and the official UCLA Law School instagram's liking of these posts support that.



4. Hurtful and accusatory emails from SBA and Dean Martí (11/2 and 11/3)

The emails all failed to acknowledge that the "recorded" material would have been of students aggressively tearing down other organizations' flyers—flyers depicting images of innocent children abducted by Hamas, a self-proclaimed terrorist group. The emails were accusatory and hurtful to a large group of us students on campus. These actions turn the blame around from the aggressive murderers/terrorists to the true victims here, and the university is not only silent, but has taken a vocal stance in support of students who condone these acts of terror.

To sum, this school has not been a safe space for me and my Jewish peers for the past few weeks. I chose to attend this university to receive an education. If I had known I would be faced with extreme antisemitism on a daily basis, I would have committed elsewhere. I have not been able to sit in class and learn for the past 34 days, especially when these students sit behind me in my classes four days a week with their Palestinian resistance/terrorist scarves (and only seconds before class is to begin, they are chanting for the genocide of my people). As I discussed with Dean Martí, I have been unable to go to class due to my pure fear and discomfort, so I have been forced to live stream my lectures and refrain from attending class in person (an act which I have not only earned, but also paying for with my tuition). Rather than solving the problem, I have been offered "accommodations" to deal with the hatred directed towards me and other UCLA Law Jewish students. I ask you — why are hateful and violence-inciting students, actively instilling fear in many around them, benefiting from such disturbing behavior?

Finally, I would like to thank Chancellor Block for finally acknowledging the tremendous pain Jewish students are experiencing on a daily basis and for his commitment to holding actors of such despicable hate accountable. I know I am speaking on behalf of myself and my Jewish peers when I say we appreciate Chancellor Block's unequivocal support for the Jewish community, and we hope to feel safe on campus soon.

Please let me know if you have any questions, and let me know if I can provide any additional information or witnesses for the above statements.
I look forward to hearing about next steps soon.

Sincerely,
Eden Shemuelian

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Eden Shemuelian

[REDACTED] | [LinkedIn](#) | [REDACTED]

Juris Doctor Candidate | UCLA School of Law

----- Forwarded message -----

From: **Chancellor Gene D. Block** <[REDACTED]>
Date: Fri, Nov 10, 2023 at 2:16 PM
Subject: Standing Against Bigotry at the University of California
To: <[REDACTED]>

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Dear Bruin Community:

Periods of conflict in the Middle East have time and again been linked to a global rise in reprehensible acts of Antisemitism, Islamophobia and anti-Arab hate. I am extremely disheartened to say that this has proven true once again, and the UCLA campus has by no means been spared.

Today, I joined University of California President Michael V. Drake and the UC chancellors in issuing a forceful condemnation of incidents of bigotry, intolerance and intimidation that have taken place on UC campuses — including UCLA — over the past several weeks. We must be crystal clear: discrimination, threats, violence and hate have absolutely no place in a university community dedicated to open-mindedness, respect and mutual understanding. Our full message appears below.

More than denounce bigotry, though, we must also actively work against it. President Drake will be sharing a series of systemwide initiatives in the coming weeks to address the current university climate, and my administration will be launching its own set of efforts to strengthen community and reaffirm our values in this period of intense strife.

I recognize that this work is urgently needed. At an event just this week on our campus, individuals exhibited extremely hateful behavior and used despicable Antisemitic language, which was captured on video and shared widely, frightening many within our community. While this may be protected speech under the First Amendment, it is nonetheless abhorrent and completely unacceptable. Campus officials are reviewing the actions at the event and anyone found to be in violation of the law or the UCLA code of conduct will be held accountable.

In our diverse university community, even if we disagree with someone passionately, we cannot devolve into dehumanizing them with rhetoric, treating them with prejudice or jeopardizing their safety. We must find the best in ourselves and in one another. Let us work towards better days ahead.

Sincerely,

Gene D. Block
Chancellor

University of California President Michael V. Drake, M.D., and the 10 University of California Chancellors sent the following message today (Friday, Nov. 10, 2023) to members of the UC community:

To the University of California community,

We write today to condemn the alarming, profoundly disappointing acts of bigotry, intolerance, and intimidation we have seen on our campuses over these past several weeks. It is our shared responsibility to maintain a sense of community where everyone feels safe and welcome.

Some of the rhetoric we have seen and heard over the past month at campus protests, online, in student government meetings, and in classrooms has been shocking and abhorrent. Let us be clear: There is no place for hate, bigotry, or intimidation at the University of California. Period.

Antisemitism is antithetical to our values and our campus codes of conduct and is unacceptable under our principles of community. It will not be tolerated.

Similarly, Islamophobia is unacceptable and will not be tolerated. We will work to ensure that those who advocate on behalf of Palestinians can also be confident of their physical safety on our campuses.

It is our collective responsibility to foster a safe and welcoming learning, living, and working environment while also promoting the principles of free expression and academic freedom. We take our obligation to uphold the First Amendment seriously, even when the viewpoints expressed are hateful or repugnant. We cannot censor voices or ban groups we disagree with, so long as those voices and groups comply with state and federal laws and with university policy.

But free speech is not absolute, and violations of policy or law will have consequences. [Regents Policy 4403: Statement of Principles Against Intolerance](#) calls on UC leaders “actively to challenge anti-Semitism and other forms of discrimination when and whenever they emerge within the University community.” We will uphold this policy. Our campuses have and will continue to impose consequences on behavior that crosses the line into unprotected speech, such as persistent harassment of individuals or groups, or credible threats of physical violence. We will also take steps against any violations of the law or university policy such as disruptions of university activity, violence, or vandalism. Our educators must continue to provide a supportive and welcoming environment for all students and avoid using classroom time for improper political indoctrination.

And while words matter a great deal — and we stand firmly by the words we share today — this is also a time for action. Over the coming days, President Drake will announce a series of initiatives to help us address the current climate on our campuses, provide additional support for our students, staff, and faculty, and improve the public discourse on this issue.

Members of the UC community may have differing opinions on the Middle East conflict, but our stand on intolerance and intimidation in our own community is unequivocal: We will not stand for it, and we will do everything in our power to ensure that the University of California is a safe community for all.

Michael V. Drake, M.D.
President, University of California

Gene D. Block
Chancellor

Carol Christ
Chancellor, UC Berkeley

Howard Gillman
Chancellor, UC Irvine

Sam Hawgood
Chancellor, UCSF

Pradeep Khosla
Chancellor, UC San Diego

Cynthia Larive
Chancellor, UC Santa Cruz

Gary May

Chancellor, UC Davis

Juan Sánchez Muñoz

Chancellor, UC Merced

Kim Wilcox

Chancellor, UC Riverside

Henry Yang

Chancellor, UC Santa Barbara

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Los Angeles, CA 90024-6971

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This email was sent to [REDACTED] via BruinPost. To contact the sender, please reply to this email or send an email to [REDACTED]. **Error!**
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Eden Shemuelian

[REDACTED] | [LinkedIn](#) | [REDACTED]

Juris Doctor Candidate | UCLA School of Law

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